

### **Remarks**

Claims 1-14 and 20-24 have been amended. Claims 15-19 and 25-64 have been cancelled. New Claims 65-73 have been added. Claims 1-14, 20-24, and 65-73 are now in the application. Consideration and allowance of these claims as now presented is respectfully requested.

### **Rejection of Claims Under 35 U.S.C. §112**

Claims 1-59 stand rejected under 35 U.S.C. §112, second paragraph, as allegedly failing to distinctly claim the subject matter of the invention. Claims 1-14 and 20-24 have been amended to address the asserted issues under 35 U.S.C. §112. The rejections thereof should accordingly be withdrawn.

### **Rejection of Claims Under 35 U.S.C. §103**

Claims 1-32 and 51-59 stand rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Anderson et al. (US 5,282,504) in view of Dotson et al. (US 5,547,011). Applicant respectfully traverses such claim rejections, in that the cited references fail to individually or in combination teach or suggest the invention as claimed.

The Anderson et al. '504 reference is directed to an assembly incorporating a venetian blind unit, wherein the assembly is securable to a door. In a first embodiment, the blind assembly (24) is secured to a door (10) by screws (22) affixing clips (34) to the frame (26) of the blind assembly (24). Such assembly relies upon mounting screws (22) to engage with holes (20) in the door (10). Such screw mounting may not be aesthetically acceptable to users, and can also result in damage to the door (10).

In another embodiment of Anderson et al. '504, illustrated in Figures 3-5, a first frame (40) is securable to a door (10a) through one or both of an adhesive tape (41) and screws passing through apertures (60) into the door (10a). This first frame (40) acts as a structure to which a blind assembly (24a) may be secured with the use of a clip (52). Here, again, the embodiment of Anderson et al. '504 illustrated in Figures 3-5 requires a mounting to the door (10a) through either or both of an adhesive or screws which may be unsightly and/or cause damage to the door itself. For example, in the event that the blind

assembly (24a) is removed from the door (10a), an unsightly first frame (40) is left behind. Removal of the first frame (40) from the door (10a) would be difficult in the case of an adhesive (41) and/or would leave the screw holes required for the mounting of the screws through apertures (60). In all, those of ordinary skill in the art clearly recognize that the multiple frame system of Figures 3-5 is intended as a permanent application which does not permit simple removal without damage to the door (10a).

By contrast, the presently claimed system facilitates rapid and removable securement of a window blind to a window. In particular, a frame-securing clip of the present invention facilitates mounting of a blind-supporting frame to a window without damage to the window, and in a manner that may be accomplished without tools. Moreover, the frame-securing clip is configured to releasably engage with the blind-supporting frame, so that disengagement of the frame from the frame-securing clip may be accomplished easily and without tools. The frame-securing clip is also configured to be easily secured to, and released from the window to which the blind-supporting frame may be secured. In this manner, the window blind assembly of the present invention may be easily secured to, and removed from a window without damage to the window.

To facilitate such engagement/disengagement described above, the claimed frame-securing clip includes a flange that is arranged for releasable retention between a beading and/or gasket and a glass pane of the window, so that the frame-securing clip is retained at the window, but may be easily released from the window by being removed from between the beading and/or gasket of the window and the window pane. Nowhere do Anderson et al. '504 describe such an arrangement or capability.

In addition, the claimed frame-securing clip includes a support extending substantially orthogonally from the flange, and further including an engaging member for releasable engagement with a cooperating receptacle in the frame. Such releasable engagement offers simple and tool-less engagement/disengagement between the frame-securing clip and the blind-supporting frame. Nowhere is such an arrangement or capability described in Anderson et al. '504.

The Dotson et al. '011 reference is cited for its discussion of interconnecting corner keys (16) of a window screen frame (14). The Dotson et al. '011 reference, however, fails to cure the defects of Anderson et al. '504, as described above.

Accordingly, the claim rejections based upon the combination of Anderson et al. '504 with Dotson et al. '011 should be withdrawn.

Claims 32, 42, and 43 were rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over DeBlock (US 6,173,754). Claims 32, 42, and 43 have been cancelled, thereby rendering moot the rejections thereof.

Claims 32-50 were rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Vecchiarelli (US 4,254,813) in view of Franssen (US 7,177,918). Claims 32-50 have been cancelled, thereby rendering moot the rejections thereof.

For the foregoing reasons, the claims as currently pending are believed to be unobvious and patentable over the cited prior art, whether taken alone or in combination. Applicant therefore submits that the presented claims are in condition for allowance. An early allowance is respectfully solicited.

The Commissioner is authorized to charge any fees or refund any overpayment under 37 C.F.R. 1.63 which may be required by this paper to Deposit Account No. 50-0789.

Respectfully submitted,

HAUGEN LAW FIRM PLLP

A handwritten signature in black ink, appearing to read 'MJB', followed by a long horizontal line extending to the right.

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